FOR THE DISTRICT OF NEW JERSEY

PANKAJ SHARMA,

Plaintiff,

v.

Civil Action No. 20-20268

VIVIAN LIU

Declaration of Pankaj Sharma in Support of Motion to Seal

Defendant.

I, PANKAJ SHARMA, declare as follows:

- 1. I am the Plaintiff, Pankaj Sharma. I am fully familiar with the facts and documents set forth herein.
- 2. I make this Certification in support of the Motion to Seal.
- 3. On October 27, 2020, the undersigned, by and through counsel, filed a Verified Complaint and Order to Show Cause seeking, among other forms of relief, injunctive relief. The Verified Complaint speaks for itself and therefore is not set forth herein or attached hereto.
- 4. Based on information and belief, the matter was transferred to federal court on or about December 23, 2020. The state court documents remain accessible to the public.
- 5. Based on information and belief, if this Honorable Court orders "that the file be sealed or that the complaint be redacted or deleted from the file, [the state] Court will comply with the order." See Exhibit "A" attached hereto.
- 6. I am an engineer, hold several significant publications and serve as a panelist in the professional organizations in my field.

- 7. The subject matter of the action is sensitive and personal in nature.
- 8. Many of the allegations contained within the Verified Complaint are personal in nature and include my social media information, employments and education history, medical details, my pictures, my home address and family details that are easily searchable.
- 9. The Verified Complaint included other sensitive court records that were ultimately expunged, but are still discoverable through a public search.
- 10. The Verified Complaint included details of a medical condition. The disclosure of sensitive, private medical information would harm me personally and professionally.
- 11. Publicly accessible court record websites have auto-published the verified complaint in its entirety online.
- 12. Continued public accessibility to the sensitive, private information contained in the pleadings and exhibits will likely cause a clearly defined and serious injury to me by harming my reputation in my religious, professional and personal communities.
- 13. Professionally, I am well known and received many awards in my field.
- 14. I am employed by a very large energy company responsible for supplying energy to the New York City region.
- 15. I am an active participant and perform prayers in my religious community.
- 16. I have a large personal community that encompasses interactions that include my wife and children.
- 17. Given the sensitive nature of the allegations as set forth in this matter, I have an interest in privacy that substantially outweighs a presumption that court and administrative records are open for public inspection.

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I declare that the foregoing statements made by me are true to the best of my present information, knowledge, and belief. I am aware that if any of the foregoing statements made by me are false, I am subject to punishment.

Dated: May 19, 2023

Pankaj Sharma

By: _____
Pankaj Sharma

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Audit trail

Title

Pankaj Declaration FEDERAL Draft 5 16 23

File name

Pankaj Declaratio...Draft 5 16 23.pdf

Document ID

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Audit trail date format

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Status

Signed

Document History

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05 / 19 / 2023

Sent for signature to Pankaj Sharma (pankaj26may@gmail.com)

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from sfineman@cohenfineman.com

IP: 96.235.163.124

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05 / 19 / 2023

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15:20:38 UTC

IP: 174.206.228.192

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Signed by Pankaj Sharma (pankaj26may@gmail.com)

SIGNED

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The document has been completed.

EXHIBIT "A"

SAMUEL B. FINEMAN, ESQUIRE COHEN FINEMAN, LLC NJ Bar ID # 005381999 1999 Marlton Pike E. Suite 4 Cherry Hill, NJ 08003 (856) 304-0699

Attorney for Plaintiff

Filed and so Ordered

Apr 14, 2023

This Motion was Unopposed

PANKAJ SHARMA

SUPERIOR COURT OF NEW JERSEY

LAW DIVISION

: MIDDLESEX COUNTY

V.

Plaintiff,

DOCKET NO. MID-L-007458-20

VIVIAN LIU

CIVIL ACTION

Defendant. : PROPOSED ORDER

DENIED

THIS MATTER having been brought before the Court by Samuel B. Fineman, Esq., counsel for Plaintiff, Pankaj Sharma, for an Order to Seal the record; and the Court having considered the moving papers and any opposition thereto; and the Court having considered the arguments of counsel; and for good cause shown;

April

IT IS on this <u>14th</u> day of MARCH 2023;

ORDERED that Plaintiff's motion to seal the record is hereby and shall be GRANTED and it

is directed that the matter known as declect number MID L 007459 20 be and is SEALED

ORDERED that a copy of this Order shall be served on all counsel of record by the Court via eCourts.

Hon. J. Randall Corman, JSC

The motion is denied for lack of jurisdiction because this matter has been removed to Federal court. If the Federal court orders that the file be sealed or that the complaint be redacted or deleted from the file, this Court will comply with the order.